

store the hierarchical structure of a source XML document. Reconsideration is requested.

As the Examiner has recognized, Krupa does not teach "*storing the remainder of said XML document in said database as an XML skeleton which defines the structure of said XML document and contains the same characters as the XML document but with said characters representing data values omitted*" as expressly required by claim 1 and the remaining dependent claims. However, the Examiner takes the position that "DBIx::DBStag teaches *storing the remainder of said XML document in said database as an XML skeleton which defines the structure of said XML document and contains the same characters as the XML document but with said characters representing data values omitted,*" citing the passage at "pg. 3 - § Storing Data" of that document.

Reconsideration is respectfully requested. The cited passage of the DBIx::DBStag reference states:

***"Storing Data***

*DBStag objects can store any tree-like datastructure (such as XML documents) into a database using normalized schema that reflects the structure of the tree being stored. This is done using little or no metadata."*

But that passage merely states that tree-like datastructures such as XML documents can be stored in a database. It nowhere describes or suggests storing "*XML skeletons which contain the characters as the XML document but with said characters representing data values omitted*" as claimed. The DBStag objects described in the cited reference represent hierarchical data structures using hierarchical tag/value pairs called STags (Structured TAGs or Simple Tree AGgregates) which can be represented as nested arrays. STag data structures are described at "Data::Stag - Structured Tags datastructures" which is available at <http://cpan.uwinnipeg.ca/htdocs/Data-Stag/Data/Stag.html> (cited as "Data::Stag manpage" at several locations in the DBIx::DBStag reference cited by the Examiner). As further explained in the cited DBIx::DBStag reference in the section entitled "STORAGE METHODS," an XML

document which contains STag data (tag/value pairs) can be processed by the method called "storenode" which recursively stores the XML element names and data values into relational tables. Thus, the hierarchical structure is saved by storing element names and data values in relational tables, using conventional SQL statements to extract data, and using stored procedures to reconstruct STag data in XML form if desired.

There is no suggestion anywhere in the DBIx::DBStag reference that an XML skeleton document (i.e., the original XML document stripped of its data value characters) is created or stored during the course of transferring XML data representing STag tag/value pairs into the relational tables. Nor is there any teaching of a mechanism for "thereafter reconstructing said XML document by merging the data content of said specified rows with said XML skeleton" as claimed.

Because the cited secondary DBIx::DBStag reference fails to suggest the creation or use of an XML skeleton document as claimed, there is basis for concluding that it would have been obvious in view of that reference to modify Krupa's system to incorporate a mechanism which the secondary reference does not teach.

Because the rejection of all of the claims in the outstanding action is based on the unsupportable premise that the DBIx::DBStag reference teaches the use of an XML skeleton as claimed, reconsideration of all of the obviousness rejections in the outstanding action which are based on that reference is requested.

This application is now believed to be in condition for allowance.

Respectfully submitted,



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I hereby certify that this Response, a *Petition for an Extension of Time*, and a *credit card payment form* are being transmitted by facsimile to the central facsimile number of the U.S. Patent and Trademark Office, (571) 273-8300, on March 1, 2006.



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Signature

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